

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Creation of a Low)	MM Docket No. 99-25
Power Radio Service)	

To: The Commission

COMMENTS

The FCC should not make LPFM stations primary service to translator stations or any other FM service. This would go against the FCC prior commitment to preserve the integrity and technical excellence of existing FM radio service when The Commission created LPFM. In addition to creating problems related to service quality the community would not be better served.

The LPFM service has enjoyed a 5 year time advantage in filing for licenses while there had not been a window of opportunity for Translator service filings or auctions. During this 5 year period of time there were plenty of opportunities to expand the LPFM service. To consider change after the 2003 Translator Filling Window would be very unjust to those participants. Everyone who participated in the 2003 Translator Filling Window has invested substantial resource in time, engineering, research and legal assistance. Often those dollars spent were from listeners and public supporters with the hope of expanding the Translator service to cover new areas.

The FM Translator service provides and important service. If "localism" is a major initiative then consideration should be given to the Translator service to allow for additional local origination within the existing service. I would recommend that a reasonable amount of local origination be allowed to help better meet the community needs. This programming could include local government meetings, local news, school events and community events as well as other programming that would benefit the local community. Thirty seconds per hour does not begin to cover this need. I would recommend a minimum of 10% (6 minutes per hour) up to 25% and allow for consolidation of time over a 24 hour period. There has been no evidence showing that LPFM better serves the local public.

The LPFM service should be improved. This would include changing the construction period from 18 months to 3 years to match the rules for other services. The FCC should consider changes to allow transfers or assignments to LPFM licenses.